in a book and invite other employers to examine it, even though the latter then refuse to hire the discharged employes.

It is well established that the jurisdiction of equity does not extend to granting an injunction in cases of libel or slander or false representation, AL. v. BLOW ET AL., 75 S. W. (Mo.).—*Held,* that in a suit to foreclose a 114 Mass. 69; *Mayer v. Stonecutters' Ass'n.,* 47 N. J. Eq. 519. A boycott does not fall within this rule; *Casey v. Union No. 3,* 45 Fed. 135; and an injunction may issue in such a case. *Oxley Co. v. Coopers' Union,* 72 Fed. 695. But it is held to apply so as to prevent an injunction being obtained against the continuing of a blacklisting agreement. *Worthington v. Waring,* 157 Mass. 421. Nor, it would seem, is such an agreement actionable at law. *R. R. Co. v. Schaffer,* 65 O. St. 414; *Bohn Co. v. Hollis,* 54 Minn. 223, 234. Though, if the employe suffers an injury by reason of a false entry in the blacklist an action would be. *Hundley v. R. Co.,* 105 Ky. 162.

MORTGAGES—PROPRIETARY MEDICINE—RECEIVERSHIP—NOTICE.—TUTTLE ET AL. v. BLOW ET AL., 75 S. W. 617 (*Mo.*).—*Held,* that in a suit to foreclose a mortgage upon the right to manufacture and sell a patent salve, where the mortgagor had threatened to disclose the secret formula, it was proper to appoint a receiver without notice to the mortgagor.

It is an established principle that courts will not appoint receivers on *R. R. Co.,* 15 Fla. 201, until defendant has filed an answer or taken *pro* motion of plaintiff, *Trilbert v. Burgess,* 9 Md. 452; *State v. J. P. & M. confesso. Whitehead v. Wooten,* 43 Miss. 523. To this rule there is the well-defined exception that a receiver will be appointed without notice to defendant on clear proof that irreparable injury will result from delay. *Olmstead v. Distilling Co.,* 67 Fed. 24; *Sims v. Adams,* 78 Ala. 395; *Cleveland, C. C. & I. Ry. Co. v. Jewett,* 37 Ohio St. 649. The court refused to appoint a receiver on an *ex parte* application in *Devoe v. Ithaca & Oswego Ry. Co.,* 5 Paige (N. Y.) 521, but granted an injunction pending the motion. Fraud on the part of defendant will aid plaintiff in obtaining appointment. *Voshell v. Hynson,* 26 Md. 83. Defendant's remedy is immediate, and on cause shown the order will be superseded. *Gowan v. Jeffries,* 2 Ashm. (Pa.) 296.

MUNICIPAL CORPORATIONS—EQUITABLE ESTOPPEL—REPEAL OF ORDINANCE. —CITY OF ASHLAND v. NORTHERN PACIFIC RY., 96 N. W. 688 (WIS.).—A city passed an ordinance vacating certain streets under an agreement with a railroad company, but the ordinance was soon afterwards repealed before the company had acted thereon. No personal notice of the repeal was given to the company, and it thereafter went on to expend large sums relying on the ordinance. The city itself erected buildings on the land formerly occupied by the streets, and took no steps to enforce the repealing ordinance. *Held,* in an action commenced 13 years after the repeal, that the city was not estopped from claiming the streets as a highway. Cassoday, C. J., and Marshall, J., *dissenting.*

In support of the proposition upon which the decision seems to rest, that no acts done after the repeal of an ordinance in reliance on the ordinance will raise an estoppel against the city, because the other party is bound by law to know that the ordinance has been repealed, no authority